

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

JEFFREY ALLEN ROWE,)	
)	
Plaintiff,)	
)	
v.)	No. 1:17-cv-03288-JPH-DLP
)	
ALICIA D. COOMER,)	
JEFFERY GLOVER,)	
BROWN,)	
)	
Defendants.)	

PROPOSED VOIR DIRE QUESTIONS — EXHIBIT 1

1. Is there anyone here who has difficulty reading, hearing, or speaking the English language?
2. Does anyone know me?
3. Do any of you know each other?
4. The attorneys in this case have introduced themselves. Please raise your hand if you know any of them, if you have ever had any business dealings with them or anyone else from their firms, or if you or anyone close to you has ever been represented by them or someone else from their firms?
 - a. Diane Marie Menashe, Ice Miller LLP
 - b. Jessa Irene DeGroote, Ice Miller LLP
 - c. Adam Matthew Alexander, Ice Miller LLP
 - d. Douglas R. Bitner of Katz Korin Cunningham, P.C.
 - e. Jarod Zimmerman of Katz Korin Cunningham, P.C.
5. Does anyone know, or has anyone ever had any dealings with, any of the parties in this case?
 - a. Plaintiff Jeffrey Allen Rowe
 - b. Alicia D. Coomer
 - c. Jeffery Glover
 - d. Cassandra Brown

6. Does anyone know, or has anyone ever had any dealings with, any of the witnesses in this case?
 - a. [List]
7. Have you ever served as a juror in a criminal or civil case or as a member of a grand jury in either a federal or state court?
8. *Read joint case synopsis.*
 - a. Has anyone read or heard anything about this case from any source?
 - b. Given this brief description of the facts, is there anything about this case that would cause you to believe that you could not consider the evidence fairly and impartially according to the law?
9. Under the law, all parties are equal.
 - a. You have heard that Mr. Rowe was a prisoner at the time of the events that are the subject of this trial. As noted, he claims that the defendants were deliberately indifferent to his serious medical condition. Is there anyone who believes that he should have no right to receive medical care just because he is a prisoner?
 - b. If selected to serve as a juror on this case, would any of you find it difficult to treat all the parties in this case fairly and impartially?
10. At the beginning and the end of the trial, I will give instructions to the jurors selected for this case. Those instructions represent the law that the jury must follow, even if the jury disagrees with the law. Is there anyone here who would have difficulty following the law, as I explain it to you in my instructions?
11. At the end of this case, you will be asked to apply a standard of proof called a “preponderance of the evidence.” That standard is different than the standard that applies in criminal cases, which you may know is proof “beyond a reasonable doubt.” A preponderance of the evidence is a lesser standard of proof, requiring only that you decide what is more probably true than not true. Is there anyone here who would have difficulty applying a “preponderance of the evidence” standard?
12. This trial may last up to three days. Is there any reason that serving on the jury in this case at this time would be especially difficult for you for personal, professional, or other reasons? For example, if anyone has any planned vacations, special work commitments, school obligations,

or child care obligations, now is the time to speak up. This will be your last opportunity to request to be excused from the jury.

13. Is there any reason not covered by one of my questions that would prevent you from being able to listen with an open mind and reach a fair and impartial decision, based solely on the evidence admitted during the trial and the instructions on the law?